

**CITY OF SEATTLE
ANALYSIS AND DECISION OF THE DIRECTOR
OF THE DEPARTMENT OF DESIGN, CONSTRUCTION AND LAND USE**

Applicant Name: City of Seattle, Department of Design, Construction and Land Use

Location of Proposal: The proposed amendments would generally apply citywide. Some amendments would apply only in Center City neighborhoods, which are the following urban villages: Uptown, South Lake Union, Capitol Hill, Pike/Pine, First Hill, and 12th Avenue.

SUMMARY OF PROPOSED ACTION

This non-project action consists of proposed amendments to the Land Use Code modifying minimum parking requirements for multifamily uses that contain units dedicated to very-low-income (non-elderly/non-disabled) households earning 30 percent or less of the area median household income.

Note: In 2001, a one-person household at 30 percent of median in the Seattle area earns an annual income of \$15,150 (\$21,650 for a family of four). For further details on the HUD Published Median Income Limits, Affordable Rents and HOME Program Rents for Seattle, see the Office of Housing's Web site at <http://www.ci.seattle.wa.us/housing/IncomeGuide.htm>

The following approvals are required:

SEPA – Environmental Determination – Chapter 25.05, Seattle Municipal Code.

SEPA DETERMINATION: ☐ Exempt ☒ DNS ☐ EIS

☐ DNS with conditions

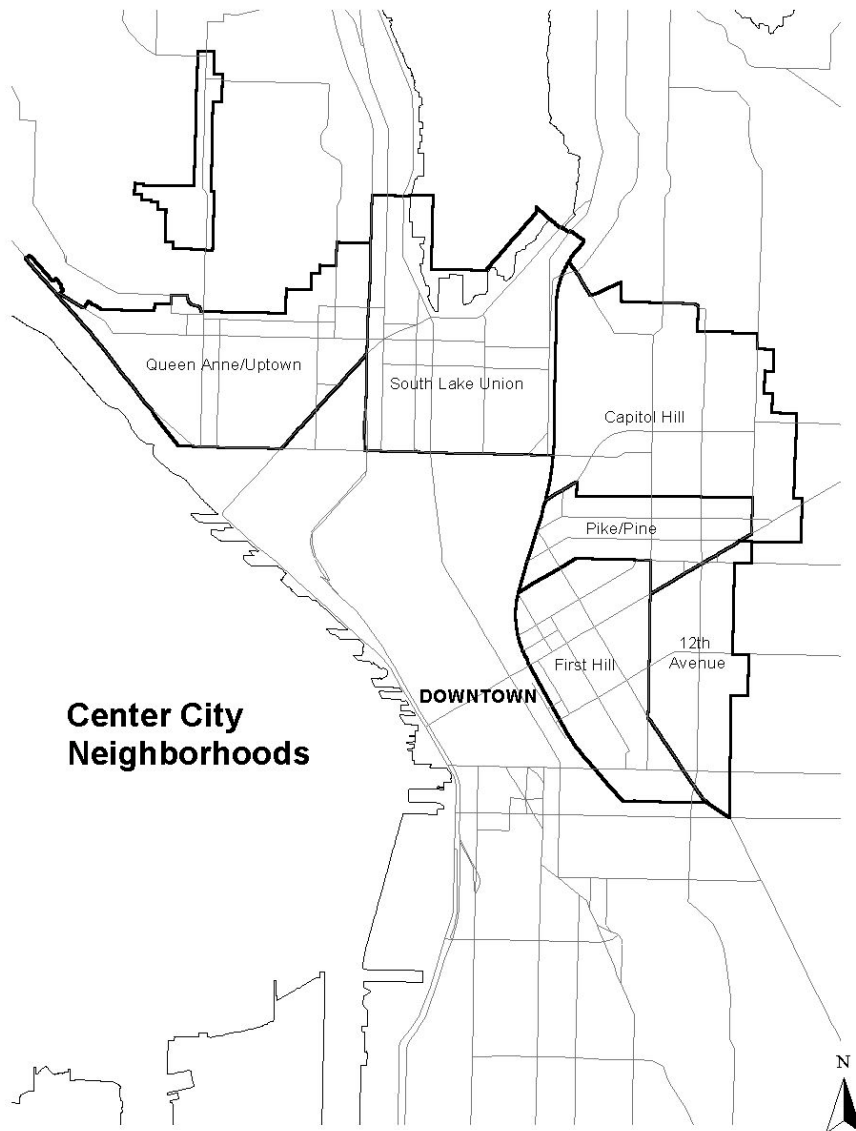
☐ DNS involving non-exempt grading or demolitions or involving another agency with jurisdiction.

BACKGROUND

Site and Vicinity Description

The proposed amendments would apply citywide in zones where multifamily uses are permitted. Some of the proposed amendments would apply only within Center City neighborhoods, which comprises the following urban village boundaries: Uptown, South Lake Union, Capitol Hill, Pike/Pine, First Hill, and 12th Avenue. Figure 1 is a map of the Center City neighborhoods.

Figure 1



An estimated 3,173 acres of land in the City (6.2% of the City's total land area) are dedicated to multifamily uses.

Proposal Description

Currently, minimum parking requirements apply to all multifamily uses, which generally range from 1.1 to 1.5 spaces per unit. Current exceptions based on low-income status are shown on Table 1.

Table 1

Multifamily Uses Exceptions based on Income	Parking Requirement
Multifamily uses occupied by low-income elderly households	1 space for every six dwelling units
Multifamily uses occupied by low-income disabled households	1 space for every four dwelling units
Multifamily uses occupied by low-income elderly/low-income disabled households	1 space for every five dwelling units
Multifamily Pike/Pine Overlay District	1 space of every 2 units for every unit set aside for occupancy by households at or below 60 percent of median.
Multifamily uses occupied by households with an income at or below 30% of median income	1 space for every 2 dwelling units for units with 2 or fewer bedrooms; 1 space for each dwelling unit for units with 3 or more bedrooms.
Multifamily uses occupied by households with an income at or below 50% of median income, located in a Center City neighborhood	1 space for every 2 dwelling units with 2 or fewer bedrooms; 1 space for each dwelling unit with 3 or more bedrooms.
Multifamily uses occupied by households with an income between 30% and 50% of median income, located outside of any Center City neighborhood	0.75 space for each dwelling unit with 2 or fewer bedrooms; 1 space for each dwelling unit with 3 or more bedrooms.

The proposed amendments to Land Use Code (Chart A of Section 23.54.015) would modify parking requirements for uses that serve very-low-income households as shown on Table 2.

Table 2

Location and income criteria⇔	Units for households at or below 30% of median income¹ in a Center City neighborhood²
Unit Size (#Bedrooms)⇓	
Two bedrooms or smaller	• 1 space per 3 dwelling units
Three bedrooms or larger	• 1 space per 2 dwelling units

1. In 2001, a one-person household at 30% of median income for the Seattle-Bellevue-Everett PMSA earns \$15,150 (\$21,650 for a family of four). *See* Appendix A.

2. For purposes of these amendments, Center City neighborhoods are the following urban villages: Uptown, South Lake Union, Capitol Hill, Pike/Pine, First Hill, and 12th Avenue.

Public Process

In March 2001, the Office of Housing mailed surveys to local nonprofit housing developers requesting parking utilization data by income category (0 to 30% of median; 31-50% of median, and 51-80% of median) for each project they own or manage. Responses were solicited from members of the Housing Development Consortium of Seattle-King County (HDC) and from nonprofit organizations receiving City funding to provide low-income housing.

Responses were compiled to evaluate the current parking requirements against the actual parking demand in these projects. Special emphasis was placed on projects built within the past ten years, for which parking was required. Providers were asked to exclude projects located Downtown, which are already exempt from parking requirements. Providers were also asked to exclude projects primarily serving low-income elderly and/or low-income disabled households, because modified parking requirements already exist for such projects. Thirty-three surveys were completed and returned.

Findings – Units at 30% or Less of Median

Analysis of Units Occupied by Households at 30% or less of Median

Twelve of these 33 projects contained set-aside units for households at or below 30 percent of median. Together, these 12 projects comprise a total of 432 units (160 of which are occupied by households at or below 30 percent of median) for which 470 parking spaces were provided. A data summary of these 12 projects is shown on Table 3.

Table 3

Bedroom Size	No. Units	Parking Used by Residents	No. Projects Reporting
SRO	11	10 (0.24:1)	1
Studio	20	5 (0.25:1)	2
1 Bedroom	44	21 (0.48:1)	5
2 Bedrooms	37	18 (0.49:1)	9
3 + Bedrooms	18	20 (1.11:1)	3
Total (all	160	74 (0.46:1)	12¹

Summary. The data presented above indicates the average number of parking spaces used by residents (63 out of 174) was 0.46 spaces/unit. On-site staff used nine additional parking spaces.

Effect of Number of Bedrooms. The data also suggest that parking use rates increase with the number of bedrooms per unit. Households living in SRO and studio units appeared to have much lower rates of parking use (i.e., approximately one space for every four units – 0.25:1), while those living in units containing three or more bedrooms had parking use rates of over one space per unit (1.1:1). Parking use among households living in one- and two-bedroom units falls in between this range with an average of about one car for every two units (0.5:1).

Length of Stay. Parking demand appears to be similar whether one lives in limited-time transitional housing or permanent housing. Although residents in transitional housing facilities tended to own fewer cars, this difference was often offset by the use of parking by on-site staff. The Low Income Housing Institute (LIHI) conducted a separate survey of parking utilization in transitional housing facilities and emergency shelters. They found average parking use rates, including staff parking, of approximately one space for every three units (0.33:1) for transitional housing and approximately one space for every five units (0.19:1) for emergency shelters.

Effect of Location. The survey's findings indicate that location (Center City neighborhoods versus those located outside of them) probably influences parking demand, even at this income level. Parking demand appeared to be higher among households living outside Center City neighborhoods. The apparent lower demand in Center City neighborhoods may be attributable to a combination of characteristics common in these neighborhoods:

- Access to more frequent transit service
- Proximity to social and other services
- High cost of parking/car storage in these neighborhoods

¹ Some projects contain both large and small units and have been counted more than once.

Enlarging the sample to include, in addition, households earning 31% to 50% of median, we find a strong pattern suggesting that location influences parking demand, with an average parking use rate inside the Center City neighborhoods of less than one space for every three units (0.31:1) and an average rate outside of almost one space per unit (0.98:1). Assuming there are no factors, aside from parking used by on-site staff, that would interrupt a smooth continuum of theoretical demand, then location seems to influence parking demand.

Table 4

Unit type and location	Estimated parking demand	Current minimum requirement	Proposed minimum requirement
2 bedroom or smaller in Center City neighborhood	0.31 space (180 units reporting)	0.5 space	0.33 space
3 bedroom or larger in Center City neighborhood	0.29 space* (21 units reporting)	1 space	0.5 space

*There is some likelihood that this result is due to chance based on the small number of 3 bedroom units (serving 30% or below median households) reporting their parking use.

Supplemental Questionnaire. To supplement the quantitative data from the survey, a brief questionnaire was distributed to service providers who work directly with this population to obtain qualitative input. Staff from the Office of Housing attended several meetings of the Homeless Families Coalition and the Seattle-King County Coalition for the Homeless both to raise awareness of the issue and to ensure a strong response rate. A total of 36 questionnaire responses were received. On average, respondents reported that 26 percent of the households they serve own cars. When residents of transitional housing facilities own cars, staff of those facilities counsel them to sell them because of the high cost of car ownership.

Data Verification

In July 2001, staff from the Office of Housing conducted a follow-up sample survey to confirm the parking utilization data reported in the original survey. On-site visits were made between 6:00 p.m. and 7:30 p.m., a time period considered to be appropriate for capturing peak period demand. Findings from this verification process indicate that less than half (45 percent) of parking spaces were actually in use at the time of visit.

Public Comments

Amendments to the Land Use Code are Type V (Legislative) Land Use Decisions, which require a public hearing before Council. The public hearing on the proposed amendments is not yet scheduled. Notice of the Council hearing will be provided at least 30 days prior the hearing in the following manner: inclusion in the General Mailed Release (GMR), publication in the City's official newspaper, and posting on the DCLU public access web site. Public testimony will be taken at the hearing. In addition, a DCLU Director's Report and copies of the proposed legislation will be available for public review and comment at the Public Resource Center and on the DCLU web site during the 30-day review period.

ANALYSIS – SEPA

The initial disclosure of the potential impacts associated with the proposed amendments was made in the environmental checklist submitted by the applicant dated February 22, 2002. The information contained in the checklist, supplemental information provided by the applicant and the experience of the lead agency with review of similar projects form the basis for this analysis and decision.

The SEPA Overview Policy (SMC 25.05.665 D) clarifies the relationship between codes, policies, and environmental review. Specific policies for each element of the environment, certain neighborhood plans and other policies explicitly referenced may serve as the basis for exercising substantive SEPA authority.

Short-term Impacts

As a non-project action, the proposed amendments will not have any short-term impacts on the environment. Future development affected by this legislation and subject to SEPA will be required to address short-term and long-term impacts on the environment.

Long-term Impacts

The proposed parking modifications are intended to result in more demand-responsive parking requirements for low-income projects. Their implementation is not expected to result in significant on-street parking impacts. Nor are any adverse impacts to earth, water, plants, animals, energy and natural resources, environmental health, aesthetics, land and shoreline uses, recreation or historic preservation, public services and utilities.

The proposed amendments could encourage increased development and construction of low-income housing projects. Consequently, a minor increase in construction impacts could result. However, project-specific mitigation measures, particularly those relating to noise, air quality, and transportation, should help minimize these impacts.

The implementation of the proposed amendments is expected to result in decreased development costs for low-income housing projects. Impacts on air quality, light and glare, and aesthetics may be reduced compared to existing conditions, as less land would likely be devoted to unused parking uses. It is also anticipated that the number of curb cuts may be reduced and this reduction in turn could help foster more pedestrian-friendly environments.

CONCLUSION

Due to the relatively minor nature of these impacts, there is no mitigation necessary or warranted by the application of the City's adopted SEPA policies.

DECISION - SEPA

- [X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030.(2)(c).
- [] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

Signature: _____ Date: _____
_____, Land Use Planning and Development Analyst
Department of Design, Construction and Land Use